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20 *2017 North Bay Fires*

21 **UNITED STATES BANKRUPTCY COURT**  
22 **NORTHERN DISTRICT OF CALIFORNIA**  
23 **SAN FRANCISCO DIVISION**

24 **In re:**

25 **PG&E CORPORATION**

26 **-and-**

27 **PACIFIC GAS AND ELECTRIC**  
28 **COMPANY,**

**Debtors**

☐ Affects PG&E Corporation

☐ Affects Pacific Gas and Electric  
Company

☒ Affects both Debtors

*\* All papers shall be filed in the Lead  
Case, No. 19-3088 (DM)*

Bankruptcy Case  
No.: 19-30088 (DM)

Chapter 11  
(Lead Case) (Jointly Administered)

**REQUEST FOR LEAVE TO FILE  
AMENDED MOTION TO EXPUNGE  
CLASS PROOF OF CLAIM FILED  
BY GER HOSPITALITY, LLC**

Hon. Dennis Montali

1 **TO THE HONORABLE DENNIS MONTALI, UNITED STATES**  
2 **BANKRUPTCY JUDGE:**

3 Claimants represented by the undersigned are victims of the Atlas, Redwood,  
4 and Camp Fires. These claimants respectfully represent:

5 **I. RELIEF REQUESTED**

6 Pursuant to Federal Rule of Bankruptcy Procedure 7015, Claimants represented  
7 by the undersigned file this motion for leave to file an amended motion to expunge  
8 GER Hospitality, LLC's class proof of claim from the record.

9 **II. JURISDICTION**

10 This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157  
11 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

12 **III. STATEMENT**

13 On March 23, 2020, attorneys for certain victims from the Camp Fires and 2017  
14 North Bay Fires filed a Motion to Expunge GER Hospitality, LLC's Class Proof of  
15 Claim ("Motion to Expunge") [Dkt. No. 6438] and a related notice of hearing [Dkt.  
16 No. 6439]. The Motion to Expunge did not reference the most recent amended class  
17 proof of claim filed by GER Hospitality, LLC, dba Aventine Glenn Ellen, for itself  
18 and on behalf of all others similarly situated, claim no. 59725, filed October 18, 2019.  
19 That claim is largely identical to the amended proof of claim referenced in the Motion  
20 to Expunge and the arguments therein still apply.

21 The Motion to Expunge also incorrectly noted that the Court appointed the  
22 Honorable John K. Trotter as trustee of the claims resolution trust and Cathy Yanni as  
23 the claims administrator. The Court has yet to take such action.

24 Accordingly, claimants request leave of court to file an amended motion to  
25 expunge directed at GER Hospitality, LLC's most recent amended class proof of  
26 claim, claim no. 59725. A copy of the amended motion to expunge is attached hereto  
27 as **Exhibit A**. A copy of GER Hospitality, LLC's class proof of claim, claim no.  
28 59725, is attached hereto as **Exhibit B**.

1                   **IV. CONCLUSION**

2                   For the foregoing reasons, claimants represented by the undersigned  
3 respectfully request leave of court to file an amended motion to expunge GER  
4 Hospitality, LLC's class proof of claim, claim no. 59725, in its entirety.

5  
6  
7                   Dated: April 7, 2020

Respectfully submitted,

8                   **CASEY GERRY SCHENK**  
9                   **FRANCAVILLA BLATT**  
10                  **& PENFIELD, LLP**

11                  By: /s/ James M. Davis

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